

1 Michael J. McCue (NV Bar No. 6055)
2 MMCCue@LRRC.com
3 Jonathan W. Fountain (NV Bar No. 10351)
4 JFountain@LRRC.com
5 Meng Zhong (NV Bar No. 12145)
6 MZhong@LRRC.com
7 LEWIS ROCA ROTHGERBER CHRISTIE LLP
8 3993 Howard Hughes Pkwy, Suite 600
9 Las Vegas, NV 89169-5996
10 Tel: 702.949.8200
11 Fax: 702.949.8398

12 *Attorneys for Plaintiff*
13 *Las Vegas Sands Corp.*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 LAS VEGAS SANDS CORP., a Nevada
17 corporation,

18 Plaintiff,

19 vs.

20 XIAOLONG LI, YANG DAEWI, YANG
21 GUANGLIANG, FA DA, JIANGHONG
22 WANG, ZHANG CHEN,
23 ZHANGCHENGGENG, CHINA CHINA, AND
24 THE UNKNOWN REGISTRANTS OF:
25 www.0077.net, www.ca0011.com,
www.ca0022.com, www.ca0033.com,
www.ca0044.com, www.ca0055.com,
www.ca1066.com, www.ca0077.com,
www.ca0088.com, www.ca0099.com,
www.036.net, www.4047.com,
www.09399.com, www.j111888.com,
www.j222888.com, www.j333888.com,
www.j666888.com, www.4337.com,
www.js722.com, www.3863jsc.com,
www.111111.com, www.lz0000.com,
www.lz0009.com, www.lz11888.com,
www.929266.com, www.333js.com, and
www.31567.com,

26 Defendants.

27 Case No. 2:15-cv-02340-GMN-VCF

28 **PLAINTIFF'S REQUEST FOR
ENTRY OF CLERK'S DEFAULT
AGAINST ALL DEFENDANTS**

3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

Lewis Roca
ROTHGERBER CHRISTIE

1 Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff Las Vegas Sands Corp. (“Las
 2 Vegas Sands”) hereby requests that the Clerk of the Court enter the default of each of the
 3 Defendants.

4 **PRELIMINARY STATEMENT**

5 This is a trademark and copyright infringement action. The Defendants are the known and
 6 unknown registrants of the following Internet domains: www.0077.net, www.ca0011.com,
 7 www.ca0022.com, www.ca0033.com, www.ca0044.com, www.ca0055.com, www.ca1066.com,
 8 www.ca0077.com, www.ca0088.com, www.ca0099.com, www.036.net, www.4047.com,
 9 www.09399.com, www.j111888.com, www.j222888.com, www.j333888.com,
 10 www.j666888.com, www.4337.com, www.20288.com, www.js567.com, www.js8666.com,
 11 www.js686.com, www.js3333.com, www.js722.com, www.3863.com, www.3863jsc.com,
 12 www.jsc0000.com, www.jsc0000.com, www.jsc1111.com, www.jsc1111.com,
 13 www.jsc2222.com, www.jsc2222.com, www.jsc3333.com, www.jsc4444.com,
 14 www.jsc4444.com, www.jsc5555.com, www.jsc5555.com, www.jsc6666.com,
 15 www.jsc88888.com, www.jsc9999.com, www.jsc99999.com, www.11111.com,
 16 www.lz0000.com, www.lz0009.com, www.lz11888.com, www.2088666.com,
 17 www.2099666.com, www.8566999.com, www.8577999.com, www.8766999.com,
 18 www.9500888.com, www.929266.com, www.31567.com, www.333js.com, www.667400.com,
 19 www.779907.com, and www.j4888.com (collectively, the “Domains”). (See ECF No. 14, First
 20 Am. Compl. (“FAC”) ¶ 25.) GoDaddy is the registrar of each of the Domains. (*Id.*)

21 The Domains are in use for a network of online casino websites that are unlawfully using
 22 Las Vegas Sands’ world famous SANDS trademark, Jinsha characters, and Sunburst design mark
 23 to trick prospective gamblers into gambling at online casinos by falsely representing that they are
 24 owned by, operated by, approved by, affiliated with, or sponsored by Las Vegas Sands when, in
 25 fact, they are not.

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STATEMENT OF FACTS

Las Vegas Sands and Its Trademarks

3 Las Vegas Sands is a world famous Fortune 500 company that is publicly traded on the
4 New York Stock Exchange. (FAC ¶ 14.) Las Vegas Sands is the leading global developer of
5 destination resort properties that feature premium accommodations, world-class gaming and
6 entertainment, convention and exhibition facilities, celebrity chef restaurants, and many other
7 amenities. (*Id.*) Las Vegas Sands' properties include The Venetian, The Palazzo, and The Sands
8 Expo and Convention Center in Las Vegas, Nevada; Sands Bethlehem in Bethlehem,
9 Pennsylvania; and Marina Bay Sands in Singapore. (*Id.*) Through its 70.2% ownership of Sands
10 China, Ltd., Las Vegas Sands also owns and operates The Venetian Macao, Sands Macao, Four
11 Seasons Hotel Macao, and Sands Cotai Central in Macao. (*Id.*) Las Vegas Sands maintains
12 websites at, among others, <venetian.com>, <palazzo.com>, <sandsexpo.com>, <pasands.com>,
13 <marinabaysands.com>, <venetianmacao.com>, <sandsmacao.com>, and
14 <sandscotaicentral.com>, through which it markets its hotel and casino services and, among other
15 things, provides information and accepts hotel room reservations. (*Id.*)

16 The original Sands Hotel in Las Vegas, Nevada, became famous by, among other things,
17 attracting numerous celebrities and serving as the setting for several famous Hollywood films,
18 including the original “Ocean’s Eleven” movie. Since 1952, Las Vegas Sands and its
19 predecessors in interest have used the SANDS trademark (in both standard character and stylized
20 forms) to provide, among others, casino services (*i.e.*, gambling and casino games). (FAC ¶ 15.)

21 Also since 1952, Las Vegas Sands' predecessors in interest and, since 2004, Las Vegas
22 Sands, have used the Sunburst design alone or in combination with the SANDS mark in
23 connection with casino services. The Sunburst design appears as follows:



27 (FAC ¶ 16.) As a result of its longstanding and prominent use of the SANDS trademark and
28 Sunburst design in commerce, Las Vegas Sands has developed common law trademark rights in

1 the SANDS trademark and Sunburst design for use in connection with, among others, casino
 2 services. (FAC ¶ 17.)

3 In addition to its common law rights, Las Vegas Sands owns trademark registrations for
 4 the SANDS trademark worldwide. In the United States, Las Vegas Sands' federal trademark
 5 registrations include, among others, the following:

Mark	Fed. Reg. No.	First Use	Goods and Services
	1,209,102	1/1/1952	“Entertainment services-namely, providing stage show, gambling and casino services . . .”
SANDS	3,734,615	12/31/1952	“[P]roviding casino and gaming services; providing casino and gambling facilities . . .”
	3,838,397	11/30/1996	“Casino services; gambling services; gaming services; Entertainment services in the nature of boxing contests and art exhibitions; arranging of seminars and conferences; educational demonstrations; rental of audio-visual equipment; rental of portable stages; rental of audio-visual equipment; preparation of special effects for trade show booths and exhibitions; entertainment, namely, lighting production.”
SANDS	3,850,500	11/30/1996	“Casino services; gambling services; gaming services; entertainment services in the nature of boxing contests and art exhibition; arranging of seminars and conferences; educational demonstrations; rental of portable stages; rental of audio-visual equipment; preparation of special effects for trade show booths and exhibitions; entertainment, namely, lighting production.”

22 (FAC ¶ 18.)

23 Las Vegas Sands Corp. also owns a Nevada state trademark registration for SANDS
 24 HOTEL & CASINO (Reg. No. TN00250422). (Las Vegas Sands' federal trademark registrations
 25 and common law rights in the SANDS mark shall be collectively referred to as the “SANDS
 26 Mark”). (FAC ¶ 19.) Based on its federal and state trademark registrations and its longstanding
 27 and exclusive use of the SANDS Mark, Las Vegas Sands owns the exclusive right to use the
 28

1 SANDS Mark in commerce. (FAC ¶ 20.) The SANDS Mark has become distinctive and famous
 2 in the United States for, among other services, casino and gaming services. (FAC ¶ 21.)

3 In addition to the foregoing trademark rights, Las Vegas Sands is the owner of all
 4 copyrights in and to the Sunburst design. Las Vegas Sands' predecessors first published the
 5 Sunburst design on December 15, 1952. Las Vegas Sands registered its copyrights in the Sunburst
 6 design with the U.S. Copyright Office effective June 21, 2010, and was granted U.S. Copyright
 7 Registration Certificate No. VA 1-724-059. (FAC ¶ 22.) Further, since 2004, Las Vegas Sands
 8 has used two Chinese language characters known as "Jinsha" in connection with its gaming, hotel,
 9 entertainment, and other services provided at its Sands Macao property, to act as the Chinese
 10 language equivalent of the SANDS Mark. Roughly translated, Jinsha means "golden sands" in
 11 Chinese. As a result of its use of the Jinsha characters in commerce in connection with its goods
 12 and services, Las Vegas Sands owns common law rights in the Jinsha characters, which appear
 13 below:



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 17 (FAC ¶ 23.)

The Defendants' Infringing Conduct

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 19 The Defendants have set up a network of Internet websites that are accessible to U.S.
 20 citizens that are designed to drive Internet users to one or more online casinos. (FAC ¶ 24.)

21 The infringing websites appear at the following Domains: www.0077.net,
 22 www.ca0011.com, www.ca0022.com, www.ca0033.com, www.ca0044.com, www.ca0055.com,
 23 www.ca1066.com, www.ca0077.com, www.ca0088.com, www.ca0099.com, www.036.net,
 24 www.4047.com, www.09399.com, www.j111888.com, www.j222888.com, www.j333888.com,
 25 www.j666888.com, www.4337.com, www.20288.com, www.js567.com, www.js8666.com,
 26 www.js686.com, www.js3333.com, www.js722.com, www.3863.com, www.3863jsc.com,
 27 www.jsc0000.com, www.jsc00000.com, www.jsc1111.com, www.jsc11111.com,
 28 www.jsc2222.com, www.jsc22222.com, www.jsc3333.com, www.jsc4444.com,

3993 Howard Hughes Pkwy, Suite 600
 Las Vegas, NV 89169-5996

Lewis Roca
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1 www.jsp44444.com, www.jsp5555.com, www.jsp55555.com, www.jsp6666.com,
 2 www.jsp88888.com, www.jsp9999.com, www.jsp99999.com, www.111111.com,
 3 www.lz0000.com, www.lz0009.com, www.lz11888.com, www.2088666.com,
 4 www.2099666.com, www.8566999.com, www.8577999.com, www.8766999.com,
 5 www.9500888.com, www.929266.com, www.31567.com, www.333js.com, www.667400.com,
 6 www.779907.com, and www.j4888.com (collectively, the “Domains”). GoDaddy is the registrar
 7 of each Domain. (FAC ¶ 25.)

8 Five of the Domains (*i.e.*, www.0077.net, www.4047.com, www.09399.com,
 9 www.3863.com, and www.3863js.com) are “directory” sites that provide links to several other
 10 online casino websites. All but two of the Domains (www.4047.com and www.09399.com)
 11 display unauthorized and infringing reproductions of the SANDS Mark, the Sunburst design,
 12 and/or the Jinsha characters. (FAC ¶ 26.)

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 Las Vegas, NV 89169-5996

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1 Taking the Domains in order, the website located at www.077.net is a “directory” site that
 2 contains links to casino webpages. An image of www.077.net is set forth below:



18 (FAC ¶ 27.)

19 This “directory” page displays the SANDS Mark, Jinsha characters, and Sunburst design
 20 and links to the following domains: www.ca0011.com, www.ca0022.com, www.ca0033.com,
 21 www.ca0044.com, www.ca0055.com, www.ca1066.com, www.ca0077.com, www.ca0088.com,
 22 www.ca0099.com, and www.036.net. (FAC ¶ 28.)

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1 Each of these domains operate an online casino purporting to be associated with, affiliated
 2 with, approved by, or sponsored by Las Vegas Sands. All display the following online casino:



15 (FAC ¶ 28.)

16 As the above screenshot clearly demonstrates, to mislead customers, the webpage
 17 prominently features the SANDS Mark, Jinsha characters, and Sunburst design in the lower, right-
 18 hand, corner of the page. (FAC ¶ 29.)

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1 The webpages located at www.4047.com and www.09399.com are Chinese-language
 2 directory pages that contain Chinese-language links to online casinos:

3 **金沙国际上网导航 www.4047.com 相信品牌的力量!**

4 金沙国际贵宾登入

5 金沙国际一站	金沙国际二站	金沙国际三站	金沙国际四站	金沙国际五站	金沙国际六站
6 金沙国际七站	金沙国际八站	金沙国际九站	金沙国际十站	试玩有奖	在线客服

7 www.4047.com

8 **金沙国际上网导航 www.09399.com 相信品牌的能量!**

9 金沙国际贵宾登入

10 金沙国际一站	金沙国际二站	金沙国际三站	金沙国际四站	金沙国际五站	金沙国际六站
11 金沙国际七站	金沙国际八站	金沙国际九站	金沙国际十站	试玩有奖	在线客服

12 www.9039.com

13 (FAC ¶ 30.)

14 These directory pages link to the following domains: www.j111888.com,
 15 www.j222888.com, www.j333888.com, and www.j666888.com. Each of these domains operates
 16 an online casino purporting to be associated with, affiliated with, approved by, or sponsored by
 Las Vegas Sands. All display the following online casino:



1 (FAC ¶ 31.) As the above screenshot clearly demonstrates, to mislead customers, the webpage
 2 prominently features the SANDS Mark, Jinsha characters, and Sunburst design in the upper, left-
 3 hand, corner of the page and again in the middle of the page. (FAC ¶ 32.)

4 The website located at www.4337.com displays a similar online casino purporting to be
 5 associated with, affiliated with, approved by, or sponsored by Las Vegas Sands:



20 (FAC ¶ 33.)

21 As the above screenshot clearly demonstrates, to mislead customers, the webpage
 22 prominently features the SANDS Mark, Jinsha characters, and Sunburst design in the upper, left-
 23 hand, corner of the page and again in the middle of the page. (FAC ¶ 34.)

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1 The website located at www.20288.com displays an online casino purporting to be
 2 associated with, affiliated with, approved by, or sponsored by Las Vegas Sands:



18 (FAC ¶ 35.)

19 As the above screenshot clearly demonstrates, to mislead customers, the webpage
 20 prominently features the SANDS Mark, Jinsha characters, and Sunburst design in the upper,
 21 center, portion of the page and again in the center-right portion of the page. (FAC ¶ 36.)

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1 The websites located at: www.js567.com, www.js8666.com, www.js686.com, and
 2 www.js3333.com display an online casino purporting to be associated with, affiliated with,
 3 approved by, or sponsored by Las Vegas Sands:



19 (FAC ¶ 37.)

20 As the above screenshot clearly demonstrates, to mislead customers, the webpage
 21 prominently features the SANDS Mark, Jinsha characters, and Sunburst design in the upper, left-
 22 hand corner of the page, on the vertical hotel tower, and again in the middle of the page. (FAC ¶
 23 38.)

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1 The website located at www.js722.com displays a similar online casino purporting to be
 2 associated with, affiliated with, approved by, or sponsored by Las Vegas Sands:



19 (FAC ¶ 39.)

20 As the above screenshot clearly demonstrates, to mislead customers, the webpage
 21 prominently features the SANDS Mark, Jinsha characters, and Sunburst design in the upper, left-
 22 hand corner of the page, on the vertical hotel tower, and in the middle of the page. (FAC ¶ 40.)

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1 The websites located at www.3863.com and www.3863jsc.com are each directory pages
 2 that appear as follows:



您的IP: 如果检测后还不能登录请按以下操作方式

操作步骤: 打开IE浏览器: 选择: 工具-> Internet选项-> 在选择 (删除历史浏览记录)-> 删除-> 重启正
 如果您是出现视频卡, 请在您的游戏页面右下角点击“摄像头”的小图标, 选择一个新线路使用看看!



(www.3863jsc.com)

(FAC ¶ 41.)

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1 As the above screenshots clearly demonstrate, to mislead customers, the webpages
 2 prominently feature the SANDS Mark, Jinsha characters, and Sunburst design. These sites link to
 3 the following domains: www.jsc0000.com, www.jsc00000.com, www.jsc1111.com,
 4 www.jsc11111.com, www.jsc2222.com, www.jsc22222.com, www.jsc333.com,
 5 www.jsc4444.com, www.jsc44444.com, www.jsc5555.com, www.jsc55555.com,
 6 www.jsc6666.com, www.jsc88888.com, www.jsc9999.com, and www.jsc99999.com. Each of
 7 these domains operates an online casino purporting to be associated with, affiliated with, approved
 8 by, or sponsored by Las Vegas Sands. All display the following online casino:



24 (FAC ¶ 42.) As the above screenshot clearly demonstrates, to mislead customers, the webpage
 25 prominently features the SANDS Mark, Jinsha characters, and Sunburst design in the upper, left-
 26 hand corner of the page. (FAC ¶ 43.)

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1 The websites located at: www.111111.com, www.lz0000.com, www.lz0009.com,
 2 www.lz11888.com, www.2088666.com, www.2099666.com, www.8566999.com,
 3 www.8577999.com, www.8766999.com, and www.9500888.com display an online casino
 4 purporting to be associated with, affiliated with, approved by, or sponsored by Las Vegas Sands:



24 (FAC ¶ 44.)

25 As the above screenshot clearly demonstrates, to mislead customers, the webpage
 26 prominently features the SANDS Mark, Jinsha characters, and Sunburst design in the middle of
 27 the page. (FAC ¶ 45.)

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1 The websites located at www.929266.com and www.779907.com¹ display an online casino
 2 purporting to be associated with, affiliated with, approved by, or sponsored by Las Vegas Sands:



18 (FAC ¶ 46.)

19 As the above screenshot clearly demonstrates, to mislead customers, the webpage
 20 prominently features the SANDS Mark and the Sunburst design in the upper, left-hand, corner of
 21 the page. (FAC ¶ 47.)

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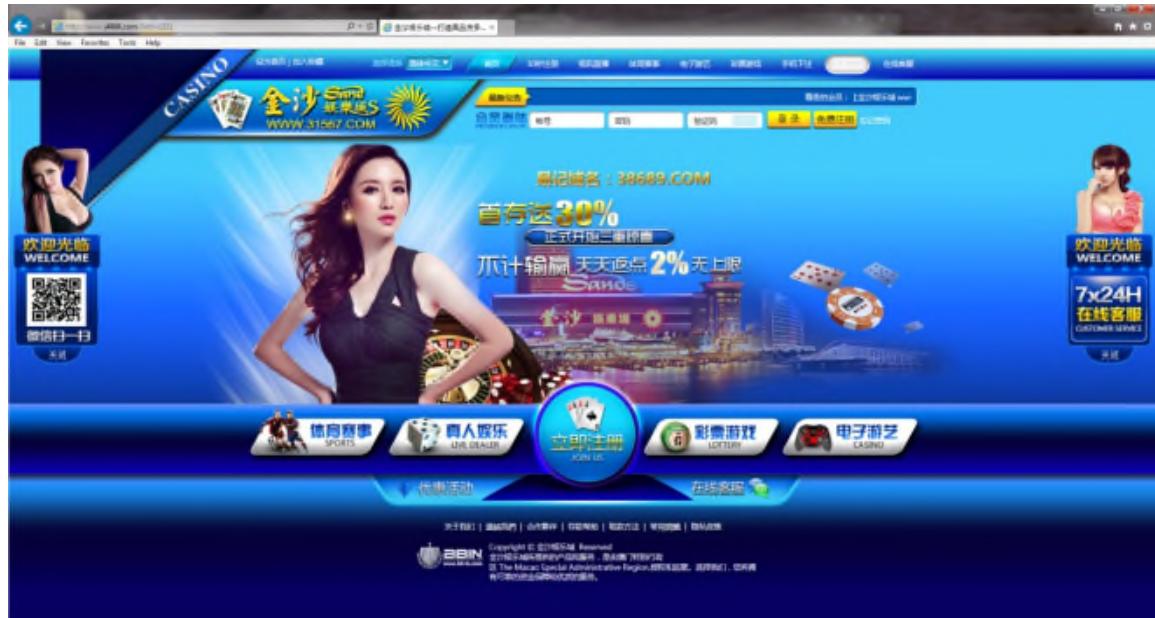
26 ///

27
 28 ¹ This domain name was erroneously identified in Paragraph 46 of the First Amended Complaint
 as 222.779907.com. The correct domain is www.779907.com, as noted in the Errata to First
 Amended Complaint, ECF No. 22.

1 The domain www.667400.com redirects consumers to the website at www.j4888.com,
 2 which displays an online casino purporting to be associated with, affiliated with, approved by, or
 3 sponsored by Las Vegas Sands:



16 (FAC ¶ 48.) When a consumer clicks on the link to www.31567.com, the website displays a more
 17 in depth online casino purporting to be associated with, affiliated with, approved by, or sponsored
 18 by Las Vegas Sands:



1 (FAC ¶ 49.)

2 The Domains offer specific casino games such as card games, roulette, or dice games, the
 3 same games offered by Las Vegas Sands at The Venetian, The Palazzo, Sands Bethlehem, Marina
 4 Bay Sands, The Venetian Macao, Sands Macao, Four Seasons Hotel Macao, and Sands Cotai
 5 Central in Macao. (FAC ¶ 50.)

6 The Domains permit gamblers to register, create individual financial accounts, and gamble
 7 online. (FAC ¶ 51.)

8 Las Vegas Sands has not consented to, approved of, or authorized Defendants' use of the
 9 SANDS Mark, Jinsha characters, or Sunburst design in connection with the Domains. (FAC ¶ 52.)

10 **PROCEDURAL HISTORY**

11 Las Vegas Sands filed its Complaint on December 9, 2015 (ECF No. 1). On January 8,
 12 2016, the Court granted Las Vegas Sands' motion seeking leave to serve the Summons and
 13 Complaint by email. (ECF No. 13.) The Court's order granted Las Vegas Sands leave to serve
 14 subpoenas on GoDaddy (the registrar of the Defendants' domain names) and Domains By Proxy
 15 to determine the Defendants' identities, physical addresses, and email addresses. (*Id.* at 2, ll. 15-
 16.) The Court's order further provided that, "Plaintiff may serve the Summons, Complaint, and
 17 all other papers required to be served in this action upon the Defendants to the email addresses
 18 provided by GoDaddy and/or Domains By Proxy in response to Las Vegas Sands' subpoenas, for
 19 each of the corresponding Domains." (*Id.* at 2, ll. 17-20.)

20 On February 4, 2016, Las Vegas Sands' counsel served Domains By Proxy with a
 21 subpoena to identify the unknown defendants. (*See* Fountain Decl. ¶ 2 & Ex. A.) Domains By
 22 Proxy responded on March 22, 2016. (*Id.* ¶ 3 & Ex. B.) However, because the documents
 23 received from Domains By Proxy did not include *any* registrant email addresses, on March 22,
 24 2016, Las Vegas Sands' counsel requested that Domains By Proxy provide the missing
 25 information. (*Id.* ¶ 3 & Ex. C.)

26 On April 1, 2016, Domains By Proxy supplemented its initial response to the subpoena and
 27 provided registrant email addresses. (*Id.* ¶ 4 & Ex. D.) The information, however, did not contain
 28 a true registrant email address for www.j222888.com – only a proxy email address was provided.

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1 (Id.) Las Vegas Sands' counsel asked Domains By Proxy to provide the actual (*i.e.*, not proxy)
2 registrant email address for www.j222888.com. (*Id.* & Ex. E.) Domains by Proxy provided the
3 information on May 13, 2016. (*Id.* & Ex. F.) Las Vegas Sands' counsel subsequently determined
4 that Domains By Proxy had also failed to include registrant email addresses for four other
5 Domains: www.3863jsc.com, www.lz0000.com, www.lz0009.com, and www.lz11888.com. (*Id.*)
6 Las Vegas Sands' counsel requested that Domains By Proxy provide the registrant contact
7 information for those domains as well. (*Id.* & Ex. G.) Las Vegas Sands' counsel received the
8 registrant email addresses from Domains By Proxy on May 20, 2016. (*Id.* & Ex. H.)

9 On March 2, 2016, Las Vegas Sands filed its First Amended Complaint, which added new
10 defendants Zhang Chen (the registrant of www.779907.com), Zhangchenggeng (the registrant of
11 www.667400.com), China China (the registrant of www.j4888.com), and two unknown
12 defendants, the unknown registrants of www.333js.com and www.31567.com. (*Id.* ¶ 5; *see also*
13 ECF No. 14, First Am. Compl.) Accordingly, on April 8, 2016, Las Vegas Sands’ counsel served
14 a second subpoena on Domains By Proxy to identify the unknown registrants of www.333js.com
15 and www.31567.com. (Fountain Decl. ¶ 5 & Ex. I.) Domains By Proxy provided the registrant
16 contact information for these domains to Las Vegas Sands’ counsel on May 13, 2016. (*Id.* & Ex.
17 J.)

18 On May 20, 2016, now having email addresses for each of the Defendants including the
19 new Defendants added in the First Amended Complaint, Las Vegas Sands' counsel served the
20 Summons and First Amended Complaint upon each and every Defendant by email. (*Id.* ¶ 6; see
21 also ECF No. 21, Certificate of Service.)

22 To date, no Defendant has answered or otherwise responded to the First Amended
23 Complaint. (*Id.* ¶ 9.)

LEGAL STANDARD

25 “Unless another time is specified by this rule or a federal statute, the time for serving a
26 responsive pleading is as follows: (A) A defendant must serve an answer: (i) within 21 days after
27 being served with the summons and complaint” Fed. R. Civ. P. 12(a)(1)(A)(i). “When a
28 party against whom a judgment for affirmative relief is sought has failed to plead or otherwise

1 defend, and that failure is shown by affidavit or otherwise, the clerk **must** enter the party's
 2 default." Fed. R. Civ. 55(a) (emphasis added).

3 **ARGUMENT**

4 Plaintiff served the Summons and First Amended Complaint by email on May 20, 2016.
 5 (ECF No. 21.) "A Defendant must serve an answer: (i) within 21 days after being served with the
 6 summons and complaint" Fed. R. Civ. P. 12(a)(1)(A)(i). Twenty-one days from May 20,
 7 2016 was June 10, 2016. However, "[w]hen a party may or must act within a specified time after
 8 service and service is made under Rule 5(b)(2)(C), (D), (E), or (F), 3 days are added after the
 9 period would otherwise expire . . ." Fed. R. Civ. P. 6(d). Because Las Vegas Sands served the
 10 Summons and First Amended Complaint by email (*i.e.*, by "electronic means" as provided for in
 11 Fed. R. Civ. P. 5(b)(2)(E)), three extra days are added to the time period for Defendants to file and
 12 serve their answer or other responsive pleading. Three days from Friday, June 10, 2016 was
 13 Monday, June 13, 2016. Therefore, Defendants each had until the end of the day on Monday,
 14 June 13, 2016, to file their answer or other response to the First Amended Complaint.

15 More than 21 days have passed since the Defendants were served by email, yet no
 16 Defendant has answered or otherwise responded to the First Amended Complaint. (Fountain Decl.
 17 ¶ 9.) Having failed to "plead or otherwise defend," the Clerk of the Court "must enter" the default
 18 of each of the Defendants. *See* Fed. R. Civ. P. 55(a).

19 **CONCLUSION**

20 For the foregoing reasons, the Clerk of the Court should enter the default of each of the
 21 Defendants on the record.

22 Dated: this 28th day of June, 2016.

23 LEWIS ROCA ROTHGERBER CHRISTIE LLP

24 By: /s/ Jonathan W. Fountain
 25 Michael J. McCue
 Jonathan W. Fountain
 3993 Howard Hughes Parkway, Suite 600
 26 Las Vegas, Nevada 89169
 Tel: (702) 949-8200
 27 Fax: (702) 949-8398

28 *Attorneys for Plaintiff
 Las Vegas Sands Corp.*

3993 Howard Hughes Pkwy, Suite 600
 Las Vegas, NV 89169-5996

Lewis Roca
 ROTHGERBER CHRISTIE

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with the Court's Order Granting Plaintiff's Motion for Leave to Serve Subpoena and for Service by Other Means (ECF No. 13), on June 28, 2016, I served the foregoing document entitled, **PLAINTIFF'S REQUEST FOR ENTRY OF CLERK'S DEFAULT AGAINST ALL DEFENDANTS**, by email transmission to the following:

Defendant / Domain Name	E-Mail Addresses Served
Xiaolong Li	js567js@126.com
Yang Dawei	ttnfbx@gmail.com
Yang Guangliang	oinhfntn@gmail.com
Fa Da	hk221111@126.com
Jianghong Wang	liner@sina.cn
Unknown Registrant of www.0077.net	casino0066@gmail.com
Unknown Registrant of www.ca0011.com	macao0099@gmail.com
Unknown Registrant of www.ca0022.com	macao0099@gmail.com
Unknown Registrant of www.ca0033.com	macao0099@gmail.com
Unknown Registrant of www.ca0044.com	macao0099@gmail.com
Unknown Registrant of www.ca0055.com	macao0099@gmail.com
Unknown Registrant of www.ca1066.com	aomenducheng@gmail.com
Unknown Registrant of www.ca0077.com	macao0099@gmail.com
Unknown Registrant of www.ca0088.com	macao0099@gmail.com
Unknown Registrant of www.ca0099.com	macao0099@gmail.com
Unknown Registrant of www.036.net	casino0066@gmail.com
Unknown Registrant of www.4047.com	mg17771888@gmail.com
Unknown Registrant of www.09399.com	ylgj888@outlook.com
Unknown Registrant of www.j111888.com	js666888@hotmail.com
Unknown Registrant of www.j222888.com	js666888@hotmail.com

1	Defendant / Domain Name	E-Mail Addresses Served
2	Unknown Registrant of www.j333888.com	js666888@hotmail.com
3	Unknown Registrant of www.j666888.com	js666888@hotmail.com
4	Unknown Registrant of www.4337.com	wohaoshuai5409@163.com
5	Unknown Registrant of www.js722.com	3160639303@qq.com
6	Unknown Registrant of www.3863jsc.com	jsyle88@126.com
7	Unknown Registrant of www.111111.com	cbnwhat@gmail.com
8	Unknown Registrant of www.lz0000.com	cbnwhat@gmail.com
9	Unknown Registrant of www.lz0009.com	cbnwhat@gmail.com
10	Unknown Registrant of www.lz11888.com	cbnwhat@gmail.com
11	Unknown Registrant of www.929266.com	cbnwhat@gmail.com
12	Zhang Chen	qq513448071@gmail.com
13	Zhangchenggeng	qazws9899@163.com
14	China China	chenyuexia1982@163.com
15	Unknown Registrant of www.333js.com	80010864@qq.com
16	Unknown Registrant of www.31567.com	chenyuexia1982@126.com

18 Dated: this 28th day of June, 2016.

19
20 /s/ Joy A. Jones
21 An employee of
22 Lewis Roca Rothgerber Christie LLP
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24
25
26
27
28

3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

Lewis Roca
ROTHGERBER CHRISTIE